

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ISRAEL BOLLAG, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-3994 (LTS)

JURY TRIAL DEMANDED

(Captions continued on following pages)

**MOTION OF THE YEN GROUP TO CONSOLIDATE RELATED ACTIONS; TO BE
APPOINTED LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD
PLAINTIFF'S CHOICE OF COUNSEL**

LEO YEN, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, ZHU
SHAN, GRAHAM EARNSHAW,
ALOYSIUS T. LAWN, JOHN H.
SPRINGER, ZHAO LI, LONG QIU YUN,
J.P. MORGAN SECURITIES, INC., UBS
AG, CIBC WORLD MARKETS CORP.,
WR HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4046 (LTS)

JURY TRIAL DEMANDED

JOEL DARRAS, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4144 (LTS)

JURY TRIAL DEMANDED

ALTON PARTNERS, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL,

Defendants.

CIVIL ACTION NO. 07-cv-4443 (LTS)

JURY TRIAL DEMANDED

BRICKMAN INVESTMENTS, INC.,
Individually And On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4719 (LTS)

JURY TRIAL DEMANDED

BLOOMFIELD, INC., Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4727 (LTS)

JURY TRIAL DEMANDED

JIAJU CHU, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-6145 (LTS)

JURY TRIAL DEMANDED

The Yen Group (“Movant”) respectfully moves this Court for an order to consolidate all related actions, to be appointed Lead Plaintiff in this action against Xinhua Finance Media, Ltd. (“Xinhua” or the “Company”) pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), and Section 27(a)(3)(B) of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. § 77z-1(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), and for approval of its selection of the law firm of Kahn Gauthier Swick, LLC (“KGS”) as Lead Counsel for the Class in this action.

The Yen Group makes this motion on the belief that it is the most “adequate plaintiff” as defined in the PSLRA because:

1. It has the largest financial interest in the relief sought by the Class and has incurred substantial losses in the amount of \$119,912.78 as a result of its purchase of shares of Xinhua stock during the Class Period, and
2. It satisfies the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

The Yen Group further requests that the Court approve the selection of its counsel, KGS, as Lead Counsel for the Class. KGS is a nationally-recognized law firm with significant class action, securities fraud and complex litigation experience, and is a firm with resources to effectively and efficiently pursue this action.

For all of the foregoing reasons, the Yen Group respectfully requests that this Court: (1) consolidate all related actions; (2) appoint the Yen Group to serve as Lead Plaintiff in this action; (3) approve the Yen Group’s selection of Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: July 23, 2007

Respectfully submitted,

KAHN GAUTHIER SWICK, LLC

/s/ Kim E. Miller
Michael A. Swick (MS-9970)

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And

KAHN GAUTHIER SWICK, LLC
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Facsimile: (504) 455-1498

*Counsel for the Yen Group and Proposed
Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on July 23, 2007.

/s/ Kim E. Miller
Kim E. Miller